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 9 Guardian Ad Litem, Michelle Henshaw

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18 Attorneys for Plaintiffs Joseph Harrison, Krystle
 19 Harrison, Martin Harrison, Jr., and Tiffany Harrison

20 **UNITED STATES DISTRICT COURT**

21 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

22 M.H., a minor, through his Guardian Ad Litem,)
 23 Michelle Henshaw, JOSEPH HARRISON, KRYSTLE) Case No. C11-2868 CW (MEJ)
 24 HARRISON, MARTIN HARRISON, JR., and)
 25 TIFFANY HARRISON, all Individually and as Co-)
 26 Successors in Interest of Decedent MARTIN)
 27 HARRISON,)
 28 Plaintiffs,)
 vs.)
 COUNTY OF ALAMEDA, a municipal corporation;)
 SHERIFF GREGORY J. AHERN, in his individual and)
 official capacities; DEPUTIES MATTHEW AHLF,)
 ALEJANDRO VALVERDE, JOSHUA SWETNAM,)
 ROBERTO MARTINEZ, ZACHARY LITVINCHUK,)
 RYAN MADIGAN, MICHAEL BARENO,)
 FERNANDO ROJAS-CASTANEDA, SHAWN)
 SOBRERO, SOLOMON UNUBUN, and DOES 1-20,)
 individually, jointly and severally,)
 Defendants.)

**STIPULATION AND (PROPOSED)
 ORDER TO CONTINUE
 SETTLEMENT CONFERENCE**

1 ALL PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
2 STIPULATE, AND REQUEST THIS COURT TO ORDER, THAT the settlement conference
3 currently scheduled before Magistrate James for April 3, 2012, be continued for approximately
4 ninety (90) days for the following reasons:

5 This is a complex wrongful death / civil rights case, that arose in the Alameda County Jail,
6 with five Plaintiffs and 12 named Defendants. Defendants are deposing all Plaintiffs plus the
7 decedent's former wife this week. Plaintiffs previously noticed, but had to continue, the depositions
8 of all Defendant deputies due to missing documents. Defendants are in the process of locating
9 additional responsive documents. The parties cannot be prepared to engage in meaningful
10 settlement discussions by April 3, due to the complexity of this matter and the discovery likely to be
11 completed by that time. However, the parties believe they will be prepared to evaluate this matter
12 for settlement by July 3, 2012. Trial is scheduled for February 4, 2013.

13 THEREFORE, THE PARTIES RESPECTFULLY REQUEST that this Court continue the
14 current settlement conference to a later date no later than July 20, 2012.

15 Dated: March 20, 2012

HADDAD & SHERWIN

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18 /s/ Michael J. Haddad

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21 MICHAEL J. HADDAD
22 Attorneys for Plaintiffs
23 JOSEPH HARRISON, KRYSTLE HARRISON,
24 MARTIN HARRISON JR., and TIFFANY
HARRISON

25 Dated: March 20, 2012

THE LAW OFFICES OF JOHN L. BURRIS

26
27 /s/ Benjamin Nisenbaum *

28
29 BENJAMIN NISENBAUM
30 Attorneys for Plaintiff
M.H.

1
2 Dated: March 20, 2012

ANDRADA & ASSOCIATES

3 /s/ J. Randall Andrada *

4 J. RANDALL ANDRADA

5 Attorneys for Defendants

6 COUNTY OF ALAMEDA, GREGORY G. AHERN,
7 MATTHEW ALHF, ALEJANDRO VALVERDE,
8 JOSHUA SWETNAM, ROBERTO MARTINEZ,
9 ZACHARY LITVINCHUK, RYAN MADIGAN,
MICHAEL BARENO, FERNANDO ROJAS-
CASTANEDA, SHAWN SOBRERO, and
SOLOMON UNUBUN

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11 * Mr. Nisenbaum and Mr. Andrada provided their consent that this document be electronically filed.

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16 **ORDER**

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18 PURSUANT TO STIPULATION, IT IS SO ORDERED. The settlement conference
19 scheduled for April 3, 2012, is hereby continued to a later date to be determined by the magistrate
20 judge, not later than July 20, 2012.

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23 Dated: 3/22/2012



24 HONORABLE CLAUDIA WILKEN
United States District Judge